

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re:

PAUL J. FOLKMAN AND
HSUEH MEI FOLKMAN,

Debtors.

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JEFFREY BLANCHARD and
JANINE BLANCHARD,

Plaintiffs,

v.

PAUL J. FOLKMAN and HSUEH MEI
FOLKMAN a/k/a MICHELLE FOLKMAN
a/k/a HSUEH MEI LEE, individually,
FOLKMAN DEVELOPMENT
CORPORATION, NRT NEW ENGLAND
LLC d/b/a COLDWELL BANKER
RESIDENTIAL BROKERAGE and
BROOKDALE CORPORATION,

Defendants.

Case No. 20-40864-btr-7

Chapter 7

Adversary Case No. 20-04083-btr

RESPONSE REGARDING FINAL PRE-TRIAL PROCEDURES

TO THE HONORABLE JOSHUA P. SEARCY, UNITED STATES BANKRUPTCY JUDGE:

NOW COME Jeffrey Blanchard and Janine Blanchard (“Plaintiffs”), pursuant to the *Notice and Order Regarding Final Pre-Trial Procedures in Adversary Proceeding* dated July 2, 2024, and file the following “Response Regarding Final Pre-Trial Procedures” in connection with the above-referenced *Adversary Proceeding*. More specifically, concerning trial of Plaintiff’s objections to discharge of Plaintiff’s claims against Debtors Paul J. Folkman and Hsueh Mei Folkman a/k/a Michelle Folkman a/k/a Hsueh Mei Lee and Defendant, Folkman Development Corporation, asserted

under Section 523(a)(6) of the United States Bankruptcy Code (11 U.S.C. §§101, et seq.). In accordance therewith and in furtherance thereof, Plaintiffs state as follows:

(1) Accurate telephonic contact information for all counsel and any self-represented individuals:

A. Plaintiff:

Michael G. Franzoi: 856-498-1748

John P. Lewis, Jr.: 972-755-7106 (Office); 214-801-6902 (Cell)

(2) An updated, precise estimate of the time which needs to be reserved for trial of this action;

Plaintiff believes trial will take 2 to 3 days.

(3) The identification of any weeks during November, 2024 and February, March, and April, 2025 during which the parties or their counsel shall be **unavailable** for trial due to existing trial settings or other unavoidable circumstances.

A. John P. Lewis, Jr. is unavailable for trial during November 4 through November 8, 2024, due to another trial setting that week in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division.

B. Plaintiff's designated experts, Ronald Tiberi, PE and Richard J. Robitaille, have not indicated to Plaintiff's counsel their availability in November 2024; and, as such, subject to any other limitations expressed herein, Plaintiffs respectfully request this Honorable Court set a trial date in February, March or April 2025, in order to provide a greater opportunity for Plaintiff's designated experts to coordinate their calendars accordingly.

C. Michael G. Franzoi is unavailable for trial during November 18 through November 29 due to pre-planned and booked travel arrangements spanning the aforementioned weeks.

D. Plaintiffs are unavailable for trial during November 18 through November 29 due to pre-planned and booked travel arrangements spanning the aforementioned weeks. Moreover, due

to Plaintiffs' children's school schedules and pre-planned commitments, Plaintiffs respectfully request this Honorable Court prioritize trial for April 2025.

Respectfully submitted,

/s/ Michael G. Franzoi

Michael G. Franzoi
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*Pro Hac Vice Counsel for Jeffrey Blanchard and
Janine Blanchard*

-and-

/s/ John P. Lewis, Jr.

John P. Lewis, Jr.
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Email: JPLewis@HaywardFirm.com

*Local Counsel for Jeffrey Blanchard and
Janine Blanchard*

Dated: July 19, 2024

CERTIFICATE OF SERVICE

This is to certify that, on July 19, 2024, a true and correct copy of the foregoing document has been served by electronic mail as follows:

Clayton L. Everett
Warren V. Norred
Norred Law, PLLC
515 E. Border Street
Arlington, TX 76010
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and by USPS First Class mail upon:

Paul J. Folkman
318 Hansen Road
Schaghticoke, NY 12154

/s/ Michael G. Franzoi
Michael G. Franzoi